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March 12, 2020

Senior District Judge I. Leo Glasser  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: 1:19-cv-06064-ILG-LB  
Rogers v. Casper's Ice Cream Inc.

Dear Senior District Judge Glasser:

This office, with co-counsel Michael Reese, Reese LLP, represents the plaintiff. In accordance with your Honor's Individual Rules, plaintiff and defendant request an extension of sixty (60) days for defendant to file an answer or respond to the complaint until Tuesday, May 19, 2020.

The original date by which defendant is required to answer or respond is Friday, March 20, 2020. There have been no previous requests for an extension of this date. No previous request was granted or denied. Defendant consents to and joins plaintiff in the present request.

The reason for this request is because the parties are engaging in good faith discussions how to proceed, such as a motion to dismiss or answer by defendant, an amended complaint by plaintiff or a resolution of the issues based on their productive discussions thus far. The parties may also use this time to exchange information relevant to the issues. This request is submitted at least 48 hours prior to the original compliance date. This request does not affect any other scheduled dates. Thank you.

Respectfully submitted,

/s/Spencer Sheehan  
Spencer Sheehan

**Certificate of Service**

I certify that on March 12, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan